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**Hearing Date: 06/21/11 at 10:00 a.m. (ET)**

Attorneys for Sprimag Inc.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
In re	: Chapter 11
	: Case No. 05-44481 [RDD]
DPH HOLDINGS CORP, <i>et al.</i> ,	:
	: Jointly Administered
Reorganized Debtors.	:
-----X	:
DELPHI AUTOMOTIVE SYSTEMS, LLC,	:
	:
Plaintiff,	: Adv. Pro. No. 07-02644 [RDD]
	:
v.	:
	:
SPRIMAG INC.,	:
	:
Defendant.	:
-----X	

**JOINDER OF DEFENDANT SPRIMAG INC. IN VARIOUS SUR-REPLIES FILED BY  
SIMILARLY SITUATED DEFENDANTS**

Sprimag Inc. (the “Defendant”) hereby concurs and joins in the following Sur-Replies, filed by similarly situated defendants: (i) Sur-Reply of Johnson Controls, Johnson Controls Battery Group, and Johnson Controls, Inc. in Further Opposition to Plaintiff’s Motion for Leave to File a First Amended Complaint, filed on June 13, 2011, Docket No. 21312 in Case No. 05-44481; (ii) Methode Electronics, Inc.’s Sur-Reply in Support of its Objection to the Reorganized

Debtors' Motion for Leave to File Amended Complaint, filed on June 14, 2011, Docket No. 21319 in Case No. 05-44481; (iii) Sur-Reply and Joinder of Defendant Victory Packaging LP in Further Support of its Opposition to the Reorganized Debtors' Motion for Leave to File Amended Complaints, filed on June 14, 2011, Docket No. 21326 in Case No. 05-44481; (iv) Sur-Reply of the Timken Company and the Timken Corporation in Further Opposition to Reorganized Debtors' Motion for Leave to File Amended Complaints, filed on June 14, 2011, Docket No. 21329 in Case No. 05-44481; (v) Ex-Cell-O Machine Tools Inc.'s Sur-Reply in Support of Response to Plaintiff's Motion for Leave to File a First Amended Complaint, filed on June 14, 2011, Docket No. 21321 in Case No. 05-44481; and (vi) all other sur-replies that have been or may be filed by similarly situated defendants (collectively, the "Sur-Replies").

On September 7, 2010, the Plaintiff filed the *Reorganized Debtors' Motion for Leave to File Amended Complaints* (the "Motion to Amend") (Docket No. 24). In response, on November 24, 2010, the Defendant filed *Sprimag Inc.'s Objection to Reorganized Debtors' Motion for Leave to File Amended Complaints and Request for Entry of an Order Vacating Certain Prior Orders Pursuant to Fed. R. Civ. P. 60 and Fed. R. Bankr. P. 9024* (the "Objection") (Docket No. 29). Finally, on January 28, 2011, the Plaintiff filed the *Reorganized Debtors' Omnibus Reply in Further Support of Motions for Leave to File Amended Complaints* (the "Reply") (Docket No. 31). In the interest of judicial economy, the Defendant joins and adopts all relevant arguments asserted and authorities cited in the Sur-Replies as if fully stated herein.

WHEREFORE, for the reasons set forth herein and in the Sur-Replies, the Defendant respectfully requests that this Court enter an Order (i) sustaining this Objection; (ii) denying the relief sought by the Motion to Amend; (iii) to the extent necessary to afford complete relief, vacating, with respect to the Defendant, pursuant to Fed. R. Civ. P. 60 and Fed. R. Bankr. P.

9024, certain orders of this Court, including the Preservation of Estate Claims Procedures Order dated August 16, 2007, the Extension Orders dated March 28, 2008, April 30, 2008, and October 22, 2009 respectively; and (iv) for such other and further relief as this Court may deem necessary and appropriate.

Dated: June 17, 2011

Respectfully submitted,

/s/ Douglas L. Lutz

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Joinder of Defendant Sprimag Inc. in Various Sur-Replies Filed by Similarly Situated Defendants* was sent via regular United States mail, postage prepaid, and/or by ECF noticing, on June 17, 2011 to the parties listed below.

/s/ Douglas L. Lutz

**VIA REGULAR MAIL**

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